

1 Bill Robins III, Esq. (SBN 296101)
2 Robert T. Bryson, Esq. (SBN 156953)
3 Rex Grady, Esq. (SBN 232236)
ROBINS CLOUD LLP
4 808 Wilshire Blvd., Suite 450
5 Santa Monica, California 90401
6 Telephone: (310) 929-4200
7 Facsimile: (310) 566-5900

5 || Attorneys for Creditor, Gail Mitcham

GRIMSHAW LAW GROUP, P.C.

7 Gravity Law Gro
26 Executive Park, Ste. 250
Irvine, California 92614
8 Telephone: (949) 734-0187
9 Facsimile: (208) 391-7860

Counsel for Robins Cloud LLP

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

14 In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16 and)
17 PACIFIC GAS AND ELECTRIC) Chapter 11
COMPANY)
18) (Lead Case–Jointly Administered)
19 Debtors)
20)
Affects:)
21 PG&E Corporation) REQUEST FOR RELIEF UPON
22 Pacific Gas & Electric Company) DEFAULT IN SUPPORT OF MOTION
23 Both Debtors) FOR ORDER AUTHORIZING
) WITHDRAWAL OF COUNSEL
24 * All papers shall be filed in the Lead)
25 Case, No. 19-30088 (DM).)
26) [RE: Dkt. Nos. 13068, 13069, 13070, and 13071]
27)
28)

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1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 Under B.L.R. 9014-1(b)(4), Robins Cloud LP (“Firm”) hereby requests that Court enter an
3 order by default on its Motion for Order Authorizing Withdrawal of Counsel to Gail Mitcham
4 (“Creditor”)¹, Dkt. No. 13068 (“Motion”).

5 **RELIEF REQUESTED IN THE MOTION**

6 The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the
7 Creditor.

8 **NOTICE AND SERVICE**

9 A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of
10 Counsel to Gail Mitcham was filed concurrently with the Motion on October 13, 2022, Dkt. No.
11 13069 (“Notice and Opportunity for Hearing”). The Motion, the supporting declaration of Robert
12 Bryson, Dkt. No. 13070, and the Notice and Opportunity for Hearing were served as described in the
13 Certificate of Service filed on October 13, 2022, Dkt. No. 13071.

14 The deadline to file a response or opposition to the Motion has passed, and no opposition has
15 been filed with the Court or received by the Firm.

16 **DECLARATION OF NO OPPOSITION RECEIVED**

17 The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,
18 that:

19 1. I am an individual over 18 years of age and competent to make this Declaration.

20 2. I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly
21 admitted to practice before all courts of the State of California and the United States District Court
22 for the Northern District of California.

23 3. I am counsel for the law firm of Robins Cloud LP (the “Firm”), attorneys of record
24 for Gail Mitcham (“Creditor”).²

25
26 ¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other
27 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client
relationship with Creditor. Declaration of Robert Bryson in Support of Motion for Order Authorizing
Withdrawal of Counsel (“Bryson Decl.”), ¶2, fn.1.

28 ² Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

1 4. I have reviewed the Court's docket in these Chapter 11 Cases and determined that
2 no response or opposition has been filed with respect to the Motion.

3 5. A proposed order will be lodged concurrently as provided for in B.L.R. 9014-
4 1(b)(3)(A).

5 WHEREFORE, the Firm hereby requests that the Court enter the proposed order filed
6 concurrently herewith granting the Motion for the reasons set forth therein.

7 Executed on November 14, 2022.

GRIMSHAW LAW GROUP, P.C.

/s/ Matthew W. Grimshaw

Matthew W. Grimshaw

Attorneys for Robins Cloud LLP

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2 **CERTIFICATE OF SERVICE**

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4 I hereby certify that on November 14, 2022, I caused the forgoing **REQUEST FOR**
RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING
WITHDRAWAL OF COUNSEL to be electronically filed with the Clerk of the Court using
5 the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with
6 the exception of Gail Mitcham.

7 I further certify that, on the same date, I caused the foregoing document to be sent via
8 first-class mail, postage prepaid, to the following interested party:

9 Gail Mitcham
10 2810 Porter Creek Road
11 Santa Rosa, CA 95404

12 */s/ Matthew W. Grimshaw*
13 MATTHEW W. GRIMSHAW